Mr. Peter Dengate Thrush  
Chairman of the Board  
ICANN  

Cc: Rod Beckstrom  
President and CEO  
ICANN  

Mr. Thrush,

As a coalition of major brand owners, CADNA urges ICANN to provide a full public response to the GAC’s concerns and recommendations as outlined in the GAC’s September 23 letter Re: GAC Comments on new gTLDs and DAGv4.

As the GAC’s letter states, “consultations by individual GAC members with business stakeholders underline how [substantial and often prohibitive defensive registration cost of new TLDs] remains a fundamental downside to the expansion of the gTLD space, far outweighing any perception of opportunities for innovation and customer-orientated benefits from the creation of corporate brand TLDs.”

The GAC goes on to suggest that “more concerted attention needs to be paid by ICANN to mitigate the costs to brand owners of new gTLDs arising from the need to acquire defensive registrations.”

CADNA acknowledges ICANN’s plans to publish descriptions of a “substantive evaluation” process for trademarks in the next Draft Applicant Guidebook (DAGv5), and the coalition looks forward to seeing how the GAC’s concerns are addressed in this and any additional language. CADNA is particularly eager to see ICANN’s response to the GAC’s call for an analysis of the economic and market impacts of the TLD launch, particularly with regard to the planned launch’s effects on competition, innovation and trademark protection.

Sincerely yours,

Josh Bourne  
President, CADNA